

**IN THE UNITED STATE DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MARCEL BODDIE

v.

HENNY'S SPORTS BAR, et al.

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**Civil Action
No. 24-1393**

PLAINTIFF'S MOTION TO COMPEL DISCOVERY

AND NOW comes Plaintiff, Marcel Boddie, by and through his Counsel Benjamin C. Hoffman, Esq., and presents the instant Motion to Compel Discovery, and in support thereof, avers the following:

1. On March 4, 2024, Plaintiff filed his Complaint in the Philadelphia Court of Common Pleas.
2. On April 3, 2024, the instant matter was removed to Federal Court.
3. On April 11, 2025, after the exchange of Initial Disclosures, Plaintiff served Request for Production of Documents on Defendants City of Philadelphia, Urban Affairs Coalition and Philadelphia Anti-Drug/Anti-Violence Network.
4. On June 16, 2025, Plaintiff filed a Motion to Compel Discovery. See Exhibit "A."
5. On July 7, 2025, this Honorable Court entered an Order compelling Defendants to provide the requested discovery.
6. To date, Defendants have not responded to Plaintiff's discovery requests, in violation of this Honorable Court's July 7, 2025 Order.
7. Defendants' continued failure to respond to Plaintiff's discovery requests will severely prejudice Plaintiff in this litigation.

WHEREFORE, Plaintiff Respectfully requests this Honorable Court enter the attached Proposed Order.

Respectfully Submitted,

RONALD A. CLEARFIELD & ASSOCIATES:

A handwritten signature in black ink, appearing to be 'B. Hoffman', written over a horizontal line.

BENJAMIN C. HOFFMAN, ESQ.
Attorney for Plaintiff